

# CHAPTER 1 - ABOUT THIS MANUAL

## 1.1 VEHICLE MAINTENANCE & THE ENVIRONMENT

Protecting the health of Indiana citizens and the quality of our land, air and water is everyone's responsibility. This responsibility is especially important for organizations in our communities that handle chemicals which can be harmful to human health or the environment. Because the owners and operators of vehicle maintenance shops deal with hazardous chemicals every day, they are often on the front line of caring for the environment and the health of their employees and the surrounding community. When handled properly, hazardous chemicals can be used safely, minimizing the health and safety risk for workers and surrounding neighbors.

The Indiana Department of Environmental Management is mandated to protect public health and the environment for the State. In fulfilling its responsibility, IDEM works to establish effective regulations and then implement and enforce those regulations. IDEM encourages business and industry to implement pollution prevention and waste minimization practices. By preventing pollution, companies can gain operating flexibility, avoid civil liability, and avoid the regulatory burdens of treatment and disposal because the quantity of waste generated is reduced or because waste is simply not generated in the first place. Pollution prevention and waste minimization practices are listed in many of the "You Should" sections throughout this manual, particularly in Chapter 4.

## 1.2 IDEM'S APPROACH TO ENVIRONMENTAL PROTECTION

As IDEM strives to meet its mandates, its approach to environmental protection in recent years has fundamentally changed. IDEM is complementing its traditional approach of simply implementing and enforcing environmental regulations with approaches that include the aggressive use of education, partnerships, and incentives. A key step in this effort was the creation of the Compliance and Technical Assistance Program in 1994 by the Indiana General Assembly and Governor Bayh. In order to effectively provide the type of assistance that may be required by the regulated community, Indiana Code Title 13, Article 28, Chapter 3, Section 4 (IC 13-28-3-4) calls for CTAP to maintain confidentiality. Specifically, the rule reads:

Inquiries made to the program and activities and documents of the program that identify or describe an individual facility or operation are confidential, unless a clear and immediate danger to the public health or environment exists. Information concerning inquiries, activities, and documents of the program that identify or describe an individual facility or operation may not be made available for use by other divisions of the department without the consent of the person who made the inquiry, participated in the activity, or provided the document.

CTAP has grown into an innovative program that has been recognized as a national leader in small business assistance. This *Compliance Manual for Indiana's Vehicle Maintenance Shops* is

a product of CTAP, in cooperation with IDEM's regulatory programs (Office of Land Quality, Office of Air Management, and Office of Water Management.)

The vehicle maintenance initiative consists of:

- 1) the production and distribution of this compliance manual;
- 2) workshops to help vehicle maintenance shop owners and operators understand their compliance responsibilities;
- 3) special recognition through the 5-Star Environmental Recognition Program for vehicle maintenance shops that exceed their environmental mandates; and
- 4) brochures designed to inform vehicle maintenance shop customers of potential environmental harm that may be caused by maintenance shop activities and of the steps that shops are taking to prevent environmental damage.

IDEM selected to undertake an initiative for the vehicle maintenance industry because:

- 1) there are too many businesses in this industry to effectively regulate them with a traditional approach;
- 2) although the environmental impact of each shop may be relatively minor, the industry as a whole has a profound environmental impact;
- 3) the industry uses a standard set of operations, allowing IDEM to provide guidance to a large audience;
- 4) the chemicals and pollutants generated by this industry are environmental priorities for IDEM, consistent with the Environmental Performance Partnership Agreement that IDEM has with the United States Environmental Protection Agency; and
- 5) the industry is represented by a number of associations that can effectively partner with IDEM to implement this project.

### **1.3 WHO SHOULD USE THIS MANUAL?**

This manual is intended for owners and operators of vehicle maintenance shops that do business in Indiana. Most of these shops are small businesses—repair shops, dealerships, and brake or muffler repair shops. The compliance requirements for these shops depend on the number of people employed, the type of operations performed, the geographic location of the shop, and the type and volume of waste generated and stored on site.

In order to represent a small vehicle maintenance shop that is subject to regulations under IDEM, the federal Department of Transportation (DOT), the Indiana Department of Labor, and the Indiana Department of Fire & Building Services, this manual is geared toward a "typical" vehicle maintenance shop. The regulations covered in this manual apply to a shop of the size and type of a "typical" shop. Read through the description of the "typical" shop on pages four and five. If your shop performs services or uses products in quantities or types not covered in this manual, contact CTAP for assistance.

## 1.4 THE BENEFITS OF FOLLOWING THIS MANUAL

By reducing the amount of hazardous wastes generated, recycling products that would otherwise be considered a hazardous waste, and, by following the regulations, you can:

- reduce the amount of waste that you generate and subsequent disposal costs.
- potentially move from the Small Quantity Generator (SQG) of hazardous waste status to the Conditionally Exempt Small Quantity Generator (CESQG) status (see Section 2.6.)
- improve your market by promoting a positive environmental image to customers.
- improve worker productivity.
- decrease worker exposure to chemical hazards in the workplace.

Be aware that both the owner and manager of a vehicle maintenance shop share responsibility and financial liability for all environmental violations that may occur. In addition, if any person intentionally, knowingly, or recklessly violates an environmental law or rule, that person may be prosecuted for the commission of a felony.

**Our typical maintenance shop is classified as a  
Small Quantity Generator (SQGs) of hazardous waste.**

**Using this manual may help SQGs become Conditionally Exempt Small Quantity  
Generators (CESQGs) or may help CESQGs remain in the CESQG classification.**

## OUR TYPICAL VEHICLE MAINTENANCE SHOP:

- ▶ generates the equivalent of approximately one 55-gallon drum of liquid hazardous waste per month, and is classified as a Small Quantity Generator (SQG) of hazardous waste.

*Note that some shops may teeter back and forth between being a Conditionally Exempt Small Quantity Generator (CESQG) and an SQG of hazardous waste. During any month(s) that your shop is classified as an SQG, you must follow the SQG requirements. By using this manual and following the “You Should” management options listed throughout Chapter 4, your shop may move from an SQG classification to a CESQG classification. Or, if your shop is already a CESQG, you may remain in that classification even if your business grows. See Section 2.6 for more information on generator status.*

- ▶ complies with all building and fire codes, and maintains portable fire extinguishers for all employees' use.
- ▶ stores oil in drums or in an above-ground storage tank with a maximum capacity of 660 gallons. The shop stores no more than a total of 1,320 gallons of oil (new and used combined.)

*If your tank has a capacity greater than 660 gallons, or if you store more than 1,320 gallons of oil, your shop must have a Spill Prevention, Containment, and Countermeasure (SPCC) plan. Refer to IDEM's web site for guidance on developing a plan or call CTAP for assistance.*

*If your shop has an underground storage tank (UST), the tank must be registered with IDEM, and you must follow substantial rules. For more information on USTs, you may obtain an order form for the Underground Storage Tank Guidance Manual via IDEM's web site or call CTAP for assistance. Note that both USTs and above-ground storage tanks are subject to Fire & Building Services regulations. Contact the Plan Review Division of Fire & Building Services for more information.*

- ▶ stores no more than 20-30 scrap tires at any given time.  
*If you store more than 30 scrap tires, you must comply with scrap tire rules. Call CTAP for assistance.*
- ▶ does only nominal grinding of metal surfaces, such as grinding that is necessary when turning brakes drums or disks.
- ▶ does only minor welding (e.g., to repair cracks, fill holes or weld pieces together) or uses welding torches to loosen rusted parts. However, the shop does not perform major machining, plating, or welding services.

## OUR TYPICAL VEHICLE MAINTENANCE SHOP (CON'T):

- ▶ has a parts washer containing a petroleum distillate-based solvent. The parts washer is regularly serviced by an outside vendor (i.e., the shop does not store solvent on site.) The maximum drum size of the parts washer is 30 gallons.

*If your shop stores solvents, you must not only follow IDEM's requirements, but must also follow OSHA and Fire & Building Services' storage requirements. Call OSHA's BuSET, the Plan Review Division of Fire & Building Services, or CTAP for assistance.*

- ▶ does not use chlorinated solvents in quantities greater than two gallons (in buckets or parts washers) to clean parts. Similarly, our typical shop does not use any non-chlorinated solvents with a chlorinated solvent content of two percent (2%) or more. Chlorinated solvents include:

- chlorobenzene (monochlorobenzene or benzene chloride)
- trichloroethylene (trichloroethane, ethinyl trichloride)
- chlorinated fluorocarbons
- methylene chloride (dichloromethane, methylene dichloride, methylene bichloride)
- tetrachloroethylene (perchloroethylene, ethylene tetrachloride, tetrachlorethylene)
- 1,1,1-trichloroethane (methyl chloroform, chloroethene)

*If your shop uses chlorinated solvents in quantities greater than two gallons or in concentrations of 2% or more, you must follow National Emissions Standards for Hazardous Air Pollutants (NESHAPs). Call CTAP for assistance.*

- ▶ does not do body work except for minor touch up (e.g., with cans of spray paint.)
- ▶ If you do body work, you must follow regulations in Part Two of the manual that covers Collision Repair and Auto Refinishing regulations. Note that the use of respirators is also covered in Part Two of this manual.

- ▶ does not wash cars.

*See Part Two of the manual, Collision Repair, for information regarding this activity.*

- ▶ does not discharge its wastewater to a septic system, storm drain, river, stream, lake or to the ground.

*If you are discharging wastewater to any of these places, there are certain actions you should take to prevent serious threats to our ground water. See the Wastewater Section in Chapter 4 or call CTAP for assistance.*

- ▶ does not store cars at the facility for later salvage.

*This manual does not address salvage yards. Call CTAP for assistance.*

## 1.5 HOW TO USE THIS MANUAL

Throughout this manual, we use the word "you" to mean the owner, operator, or manager of a vehicle maintenance shop. Chapter 4 addresses the products used by vehicle maintenance shops as well as the services performed. In many of the sections throughout the manual, there are lists of things that:

- **you must** do in order to be in compliance;
- **you should** do in order to improve the environmental health of your shop; and
- **you should consider** in order to make significant environmental improvements.

The list of options to consider typically involves up-front costs and/or innovative technology. Please pay special attention to the lists as you read through or refer back to this manual.

The majority of sections within Chapter 4 are presented in the following manner:

- **HAZARDS & RULES**
  - **Base Materials - Hazards and Impacts**
  - **Additives and Contaminants - Hazards and Impacts**
  - **Regulatory Overview**
- **MANAGEMENT RESPONSIBILITIES**
  - **You Must**
  - **You Should**
  - **You Should Consider**
- **BACKGROUND ON OPTIONS TO CONSIDER**

This manual covers your state and federal requirements, but does not cover local regulations. Please be aware that your city and/or county may have additional regulations that you must follow.

## 1.6 WHOM TO CALL FOR ASSISTANCE

If you have questions or need compliance assistance, please contact the appropriate office within IDEM or the appropriate regulatory agency. Keep in mind that CTAP offers confidentiality, but the regulatory program areas of IDEM and the other listed regulatory agencies do not.

### # IDEM's Compliance & Technical Assistance Program (CTAP)

IDEM - OPPTA

150 West Market St., Suite 703

Indianapolis, IN 46204-2811



**Indianapolis Office**  
317/232-8172 or  
800/988-7901



**Northern Regional Office**  
219/245-4879 or  
800/753-5519 ext. 4879



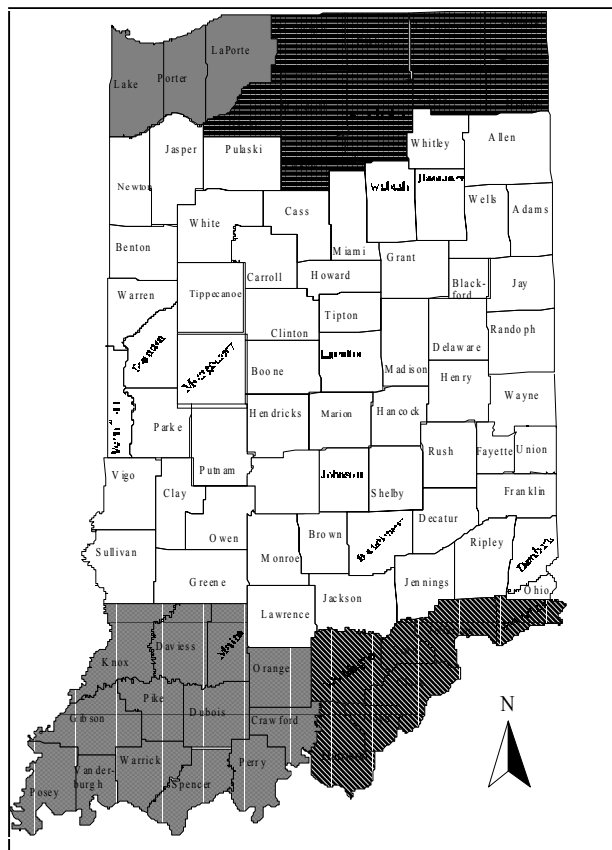
**Northwest Regional Office**  
219/881-6720 or  
888/209-8892 ext. 6720



**Southern Indiana Office**  
812/952-1144



**Southwest Regional Office**  
812/436-2583 or  
888/672-8323 ext. 2583



- **IDEM's Spill 24-Hour Emergency Hotline**  
317/233-7745 local and out-of-state or toll-free at 888/233-7745 (in-state only)
- **IDEM's Office of Air Management (OAM)** 317/233-0178 or toll-free at 800/451-6027, press 0 and request ext. 3-0178
- **IDEM's Office of Land Quality (OLQ)**
- **Emergency Response**  
317/308-3017 or toll-free at 800/451-6027, press 0 and request ext. 308-3017
- **Technical Compliance Section**  
317/308-3040 or toll-free at 800/451-6027, press 0 and request ext. 308-3040
- **Industrial Waste Compliance Section (formerly known as the Special Waste Section)**

317/308-3013 or toll-free at 800/451-6027, press 0 and request ext. 308-3013

- **IDEM's Office of Water Management (OWM)**
- **General Information**  
317/232-8476 or toll-free at 800/451-6027, press 0 and request ext. 2-8476
- **Information regarding Construction Permitting, Wastewater Treatment & Sanitary Sewers**  
317/232-8645 or toll-free at 800/451-6027, press 0 and request ext. 2-8645
- **Information regarding Wellhead Protection**  
317/308-3308 or toll-free at 800/451-6027, press 0 and request ext. 308-3308 or visit the website at: <http://www.state.in.us/idem/owm/dwb/wellhead>
- **IDEM File Room Phone Numbers**  
You may contact the file rooms toll-free by calling 800/451-6027, press 0 and provide the operator with the appropriate phone number.
- **Air - 317/232-8391**
- **Land Quality - 317/232-3399, 317/232-4514**
- **Land Quality files consist of Underground Storage Tanks, Leaking Underground Storage**  
Tanks, Excess Liability Fund, Spills, Federal programs, State Cleanup, Land Application,
- **Septic Haulers, Confined Feeding Program, and Voluntary Remediation Program Solid and Hazardous Waste - 317/234-0964**
- **Spills - 317/234-0963**
- **Water - 317/232-8667**

<p style="text-align: center;"><b>Visit IDEM Online at:</b> <b><a href="http://www.IN.gov/idem">www.IN.gov/idem</a></b></p>
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**Indiana Department of Fire & Building Services**

402 W. Washington St.

Indianapolis, IN 46204

■ Plan Review Division 317/232-1431

■ Fax 317/233-4892

■ Book Store 317/232-6173

Department of Fire & Building Services web site: <http://www.state.in.us/sema/osfm.html>



- **Indiana Department of Labor - Bureau of Safety Education and Training (BuSET)**  
402 W. Washington St.  
Indianapolis, IN 46204  
317/232-2688

Department of Labor's web site: <http://www.state.in.us/labor>

*The Indiana Department of Labor is responsible for enforcing OSHA regulations in the state of Indiana. As a division of the Department of Labor, BuSET provides assistance to Indiana's regulated community through presentations, training programs, and site visits.*

- **Indiana Department of Transportation (INDOT)**  
100 N. Senate Avenue  
Room N848  
Indianapolis, IN 46204-2218  
317/232-6787  
Department of Transportation's web site: <http://www.state.in.us/dot>

## 1.7 OTHER SOURCES OF INFORMATION

- **National Spill Response Center 800/424-8802**
- **EPA Ozone Protection Hotline 800/296-1996**  
EPA's automotive air conditioning web site: <http://www.epa.gov/ozone/title6/609>
- **RCRA Hotline (EPA's Hazardous Waste Information Line) 800/424-9346**
- **Local Health Department**  
*Visit the Indiana State Department of Health's web site at [http://www.state.in.us/isdh/links/local\\_dep/index.html](http://www.state.in.us/isdh/links/local_dep/index.html) for a listing of local health department directors.*
- **Publicly Owned Treatment Works (POTW)**  
(also called "local wastewater treatment plant" or "wastewater treatment plant")  
*Refer to IDEM's web site for a listing of the 45 POTWs with approved wastewater pretreatment programs.*
- **Solid Waste Management Districts**  
*Refer to IDEM's web site for the Directory of Indiana Solid Waste Management District Directors.*
- **Industry Associations**  
*Refer to IDEM's web site for a listing of industry associations serving the vehicle maintenance industry.*
- **The International Automotive Technicians Network**  
Visit their web site at [www.i-atn.com](http://www.i-atn.com)
- **Insurance/Worker Compensation Providers**